



MEMO ENDORSED

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Application GRANTED. Plaintiff has until August 14, 2025 to respond to the motion to dismiss.

June 27, 2025

Parties are reminded that a case management conference is scheduled for August 13, 2025 at 10:00 AM. See ECF No. 6.

VIA ECF

Hon. Jessica G. L. Clarke, U.S.D.J.
United States District Court, S.D.N.Y.
500 Pearl Street, Room 1040
New York, NY 10007

The Clerk of Court is directed to terminate ECF No. 12.

SO ORDERED.

JESSICA G. L. CLARKE
United States District Judge

RE: *Schiavone v. Town of Orangetown.*,
Case No.: 7:25-cv-03345-JGLC

Dated: June 30, 2025
New York, New York

Dear Judge Clarke:

This office represents Plaintiff Joe Schiavone in the above-referenced action. I write to respectfully request a 45-day extension of time, from Monday June 30 to August 14, 2025 to respond to Defendant's Motion to Dismiss filed on June 20, 2025. *See* Dkt. No. 11. Based upon this proposed new timeline, Defendants' reply, if any, would be due August 21, 2025. Prior to making this request, undersigned counsel has conferred with counsel for Defendant who consents to this request and its timeline.

This is the first request for this extension. The reason for the extension request is pre-planned travel on the originally-scheduled response deadline, as well as a full litigation calendar in the month of July along with additional pre-planned travel. At this time there is no scheduled appearance before the Court.

As to Your Honor's individual rules, Plaintiff intends to file an amended complaint on or before the deadline to do so, which based upon Defendant's motion to dismiss would be July 11, 2025.

We thank the Court for its time and consideration in this matter.

Respectfully submitted,

BELL LAW GROUP, PLLC

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cc: All parties via ECF